

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-B and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs.

Respectfully:

/s/ Barbara Binis

Barbara Binis
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsSmith.com

/s/ Erik W. Legg

Erik W. Legg
FARRELL WHITE & LEGG
P. O. Box 6457
Huntington, WV 25772-6457
304.522.9100 (phone)
304.522.9162 (fax)
EWL@farrell3.com

Attorneys for Defendant American Medical Systems, Inc.

/s/ Mathew Coveney

Mathew Coveney
COVENEY LAW
3rd Floor
1075 Main Street
Waltham, MA 02451
508.449.4228 (phone)
781.250.2836 (fax)
mcoveney@unitedlawteam.com
Attorney for Plaintiffs on Exhibit A

/s/ Laura V. Yaeger

Laura V. Yaeger
MORGAN & MORGAN
Suite 700
201 North Franklin Street
Tampa, FL 33602
813.318.5171 (phone)
813.222.4796 (fax)
lyaege@forthepeople.com
Attorney for Plaintiffs on Exhibit B

Dated: August 6, 2018

EXHIBIT A – COVENEY LAW

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:16-CV-08743	Frances- Faye Myers v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:16-CV-09799	Laneigha Shuman v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:16-CV-09800	Deborah Juarascio v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:16-CV-10292	Judy Hamann v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – MORGAN & MORGAN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-CV-08914	Marie Schafer, James Schafer v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis
Barbara R. Binis